



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

June 29, 2015

Jonathan Beck, Project Lead, Greater Sage-Grouse LUP Amendments,  
Idaho and Southwestern Montana Sub-Region  
Bureau of Land Management  
1387 South Vinnell Way  
Boise, Idaho 83709

Dear Mr. Beck:

The EPA has reviewed the BLM and Forest Service's Idaho and Southwestern Montana Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement (FEIS) (EPA Project Number 13-0039-BLM FEIS). Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

We applaud your efforts to amend land use plans with regulatory mechanisms that will avoid continued degradation of greater sage-grouse habitat because, according to information cited in the FEIS, if current trends in wildfire, populations and habitat activities continue, populations of sage-grouse in Management Zone IV (most of Idaho and parts of Montana, Utah, Nevada and Oregon) are estimated to decline by 55 percent between 2007 and 2037, and by 66 percent in MZ II (Wyoming and parts of Idaho, Utah and Colorado).<sup>1</sup> Land use plan amendments are a necessary part of efforts to reverse these negative population trends.

**Responsiveness to our Draft EIS comments**

Our primary concern with the Draft Land Use Plan Amendments/EIS (DEIS) was the relatively smaller amount of greater sage-grouse (GRSG) habitat provided by the most protective management designation in Alternative E - one of the DEIS's co-preferred alternatives. By increasing the amount of GRSG habitat receiving the most protective management designation by 295,800 acres, the Proposed Plan is partially responsive to our primary environmental concern.

We also recommended a more precautionary approach to adaptive management. While the FEIS maintains a reaction based approach - increasing protection when monitoring shows habitat and population declines - we appreciate the FEIS's additional adaptive management information. Improvements to the adaptive management and monitoring appendices help to increase the likelihood that the proposed adaptive management strategy will be effective.

The FEIS includes responsive information on our other DEIS comments, relating to: fire management, grazing, infrastructure, consistency with conservation criteria, and Areas of Critical Environmental Concern.

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<sup>1</sup> FEIS, p. 1-19

In the interest of further improving the Proposed Plan between now and the Record of Decision, we offer the following recommendations.

**Increase or maintain the amount of Priority Habitat Management Area in the Final Plan**

Our primary environmental concern about the relative amount of GRSG habitat receiving the most protective designation largely remains. This concern remains because the FEIS's Proposed Plan provides the most protective designation for 1,367,200 fewer acres of Priority Areas for Conservation compared to Alternative D.<sup>2</sup> Priority Areas for Conservation are described in the COT report as, "...key habitats that are essential for sage-grouse conservation".<sup>3</sup>

To address our primary environmental concern, we reiterate our recommendation for the final Plan to increase or maintain the current amount of Priority Habitat Management Area (PHMA). Strong protections for key habitat increases the likelihood that the highest level objective, a neutral or positive population trend, can be achieved.

**Establish a goal or monitoring measure for Rangeland Fire Protection Associations**

Habitat loss and fragmentation due to increased occurrence of wildfire is one of the primary threats to GRSG within the Idaho and Southwestern Montana Sub-region.<sup>4</sup> Overall, we believe that the Proposed Plan's management for Wildfire Preparedness/Prevention, Wildfire Suppression, and Fuels Management will help to alleviate this primary threat. To improve fire related management, particularly response times, we suggest you consider establishing a goal and monitoring measure for Rangeland Fire Protection Associations.

Rangeland Fire Protection Associations take advantage of quick initial attack that ranchers can provide; satisfy ranchers' interest in being active participants and managers of safety concerns; and enhance efforts to protect sage grouse habitat. A stated goal - based on the general principal that what we measure, matters - could include a goal of 100 percent of GRSG PHMA habitat with established Rangeland Fire Protection Associations.

**Clarify the anthropogenic disturbance calculation for Idaho**

We appreciate the anthropogenic disturbance cap because we believe it will help to avoid and minimize another primary threat to GRSG in Idaho and Southwestern Montana - human development. The human development threat includes impacts from the construction and operation of transmission lines, pipelines, roads and other development as defined in the EIS.

To reduce potential confusion on how the disturbance calculation is made in Idaho, we recommend that the Record of Decision (ROD) or final adaptive management document include clarifying information on how fire, invasives or other non-anthropogenic disturbances, are accounted for. We believe clarifying information is necessary because FEIS Appendix G appears to present fire effects both as being excluded and included in the calculation.<sup>5</sup> Excluding the fire effects would increase risk to GRSG by

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<sup>2</sup> See FEIS, Table 4-16

<sup>3</sup> U.S. Fish and Wildlife Service, Dear Interested Reader introduction to the Greater Sage-grouse Conservation Objectives: Final Report, available online at: <http://www.fws.gov/greatersagegrouse/documents/COT-Report-with-Dear-Interested-Reader-Letter.pdf>

<sup>4</sup> FEIS, p. 1-13

<sup>5</sup> "Areas that are not sage-grouse seasonal habitats, or are not currently supporting sagebrush cover (e.g., due to wildfire), are not excluded from the acres of PHMA in the denominator of the formula." (FEIS, p. G-5)

potentially over-estimating actual GRSG habitat. Including the fire effect would be more protective for GRSG because the disturbance cap is measured as a proportion of actual habitat.<sup>6</sup> Addressing this recommendation could be as simple as more clearly differentiating the Idaho equation from the Southwestern Montana equation.

#### **Address implementation certainty for adaptive management**

To increase the likelihood that management responses will be implemented and effective, we recommend that the ROD or final adaptive management document include additional information on potential implementation level actions to consider in the event that hard trigger criteria are met. FEIS Appendix G includes a list of actions to consider in the event that soft trigger criteria are met.<sup>7</sup> Please address whether that same list also applies to hard triggers.

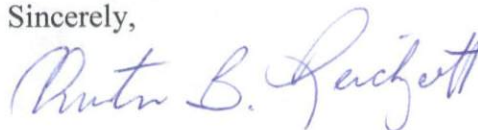
A major adaptive management response is to increase protections by managing Important Habitat Management Areas as Priority Habitat Management Areas. Other management responses to consider that are listed in FEIS Appendix G, and which we believe may be both necessary and difficult to implement, depend on increasing or reallocating resources.

For actions which depend on increasing resources, we recommend that the ROD, or final adaptive management document, include additional information on the certainty of adequate resources for full implementation.

For actions that depend on reallocating resources, we recommend that the ROD or final adaptive management document include additional information on the certainty that all necessary parties will approve, and that the BLM will be able to implement, the re-direction of resources based on GRSG monitoring information.

If you have questions regarding our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or Erik Peterson at (206) 553-6382 or [peterston.erik@epa.gov](mailto:peterston.erik@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

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<sup>6</sup> "The Idaho calculation does consider the effect fire has on the habitat and includes loss of habitat from fire as part of the calculation by weighting the denominator based on the actual habitat available to the GRSG." (FEIS, p. G-15)

<sup>7</sup> FEIS, p. G-34-35